

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SUN CHENYAN,

Plaintiff,

vs.

THE PARTNERSHIPS AND
UNINCORPORATED ASSOCIATIONS
IDENTIFIED ON SCHEDULE “A,”
Defendants.

Case No.: 1:20-cv-00220

Judge: Hon. John F. Kness

Magistrate: Hon. M. David Weisman

**AGREED MOTION TO SET PROPOSED INTERVENORS’ DEADLINE
TO FILE REPLY BRIEF**

COME NOW the Proposed Intervenor, who are Store Owners¹ of certain Online Stores² referenced, but not named as defendants, in Plaintiff’s First Amended Complaint, by and through their counsel, and file this agreed motion (“Agreed Motion to Set Deadline”) to set a deadline of January 31, 2025 for them to file their reply in support of their Opposed Motion to Dismiss Pursuant to Fed. R. Civ. P. 12(b)(7) or, alternatively, Motion to Intervene Pursuant to Fed. R. Civ. P. 24 (“Opposed Motion to Dismiss/Intervene”).

I. INTRODUCTION AND ARGUMENT

Proposed Intervenor filed their Opposed Motion to Dismiss/Intervene on November 12,

¹ The term “Store Owners” refers to the seventeen (17) Chinese companies listed in the table in Exhibit 1 to their Opposed Motion to Dismiss/Intervene, along with the Online Store(s) that they own. *See* Dkt. 268-1.

² The term the “Online Stores” refers to the following stores formerly named as defendants in Plaintiff’s original complaint (Dkt. 1): Asyouwant (5), batyfellmay (6), bobosuperman (10), Changushop (13), darlinghome1 (19), Denlertop1 (23), Fivestarshop88 (34), Futurestore8 (38), Globalbuy2 (39), let’s gogogo (51), LuckyStore2017 (55), Miss You66 (58), Mrss Right (60), myall (61), Newfirepinler (63), sayyousayme9 (76), Seeyouagain1+1 (77), Sunshinegirl88 (82), tabeanytop (83), taotaosmile (86), tooyoung1 (89), Uptwoyou (92), whenyoubelieve (97), Willbest (98), wonbest (99), xiaoyesmile (103), yourname1 (109), yunjiesmile (111), and Zhouxiaosmile (115).

2024. Dkt. 273. On December 20, 2024, Plaintiff filed her second agreed motion for extension of time to respond to the Opposed Motion to Dismiss/Intervene and requested the deadline to respond be extended until January 15, 2025. Dkt. 295. Proposed Intervenors did not oppose an extension but requested two weeks for the reply. Dkt. 295 ¶13. The Court granted Plaintiff's second agreed motion for extension of time but the Court's minute entry did not state a deadline for the reply brief. Dkt. 296. Plaintiff filed the response to the Opposed Motion to Dismiss/Intervene on January 15, 2025. Dkt. 300.

Proposed Intervenors respectfully request that the Court set January 31, 2025 as the deadline for their reply brief. Two weeks from Plaintiff's response to the Opposed Motion to Dismiss/Intervene is January 29, 2025, but Proposed Intervenors request that the deadline for the reply be January 31, 2025 to allow them a couple extra days prepare and file the reply, especially because of their uncertainty as to the reply deadline.

Plaintiff will not be prejudiced by granting this Motion. This Motion is not for purposes of delay and will not impact any other deadlines in the case.

II. CONCLUSION

For the foregoing reasons, the Proposed Intervenors respectfully request that the Court grant their Agreed Motion to Set Deadline, and set a deadline of January 31, 2025 for them to file a reply in support of their Opposed Motion to Dismiss/Intervene.

Respectfully submitted:

Date: January 29, 2025

By: Michael P. Adams

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**ATTORNEYS FOR PROPOSED
INTERVENORS LISTED HEREIN**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on January 29, 2025 to all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system.

/s/ Michael P. Adams
Michael P. Adams

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